

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR,

Plaintiff,

v.

WASHOE COUNTY, NV, et al.,

Defendants.

Case No.: 3:24-cv-00526-ART-CSD

**DECLARATION OF DREW J. RIBAR IN SUPPORT OF MOTION TO WITHDRAW
AND AMEND ADMISSIONS, EXTEND DISCOVERY DEADLINES, AND FOR
PROTECTIVE ORDER**

I, Drew J. Ribar, declare under penalty of perjury under the laws of the United States:

1. I am the pro se Plaintiff in this case (3:24-cv-00526-ART-CSD).

2. On 03/19/2025, I was rear-ended by a semi-truck, sustaining whiplash and shoulder pain, requiring emergency care (Exhibit A, 03/20/2025), X-ray referral (Exhibit B, 03/2025), and chiropractic treatment on 04/02, 04/07, and 04/16/2025 (Exhibit C), limiting computer use for discovery tasks.

PLEADING TITLE - 1

1 3. I manage four lawsuits: this case, *Ribar v. Carson City* (3:24-cv-103), *Ribar v. NV
2 Legislative Counsel Bureau* (3:25-cv-90), and *Ribar v. Nevada DMV* (24-trt-62-1b),
3 requiring a 463-page FAC with 10,000+ pages of records (ECF No. 65; Exhibit F, Interrogatory
4 7).

5
6 4. Defendants' 39 RFPs, including RFP No. 28 (190–350 pages of AI chat logs), demand
7 terabytes of data. The logs reflect my legal research and strategy, protected as work-product (*In
8 re Grand Jury Investigation*, 974 F.2d 1068, 1071 (9th Cir. 1992); Exhibit E, RAF 56; Exhibit
9 F, Interrogatory 20). Compilation is burdensome due to injuries and workload (Exhibits A–C).

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11 5. Due to these constraints, I could not timely respond to Defendants' 59 RAFs (due
12 04/01/2025), 20 Interrogatories, and 39 RFPs (due 04/07/2025).

13 6. I filed a Motion for Extension on 04/08/2025 (ECF No. 77, granted ECF No. 80), proposed a
14 stipulation on 04/15/2025, which Defendants partially accepted (Exhibit D), and filed RAF and
15 Interrogatory responses on 04/22/2025 (Exhibits E–F).

16
17 7. Defendants' skepticism (Exhibit D) about my social media (RAFs 1–6) and AI use (RAF 56)
18 is misplaced, as posts were pre-edited and AI requires extensive review, infeasible during
19 recovery (Exhibits A–C; *Haines v. Kerner*, 404 U.S. 519 (1972)).

20 8. Withdrawal of RAF admissions preserves claims (Exhibit E, RAFs 7, 27, 59; Exhibit F,
21 Interrogatory 16), supported by Exhibits 28–32 (ECF Nos. 70–71) [pending].
22

23
24 I declare the foregoing is true and correct.

25
26 Dated: April 23, 2025

27 /s/ Drew J. Ribar
28

PLEADING TITLE - 2

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3 Washoe Valley, NV 89704
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5
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8 CERTIFICATE OF SERVICE

9 I certify that on April 23, 2025, I served this DECLARATION via CM/ECF or U.S. mail to:

10 Lindsay L. Liddell
11 Deputy District Attorney
12 One South Sierra Street
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15
16

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24
25 /s/ Drew J. Ribar

26 Drew J. Ribar, Pro Se
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28 PLEADING TITLE - 3